

SPALDING SPORTS WORLDWIDE, INC.  
425 MEADOW STREET P.O. BOX 901  
CHICOPEE MA 01021-0901 USA  
413.536.1200  
413.536.1404 FAX

September 28, 2000

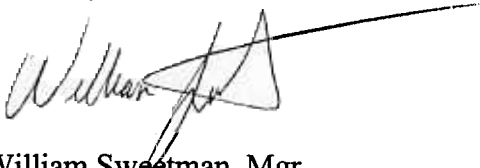
The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Ave.  
Cambridge, MA 02140

Dear Sir/Madam:

Spalding Sports Worldwide has submitted with this letter its completed application for its participation in the EPA's National Environmental Achievement Track program for its Chicopee, MA facility. Spalding has been an active participant in the EPA's StarTrack program since its inception, and has gone through full cycles of compliance and EMS audits, coupled with annual performance reporting.

If there are any questions regarding the information contained in the application, I may be reached at (413) 322-2637.

Sincerely,



William Sweetman, Mgr.  
Environmental Engineering

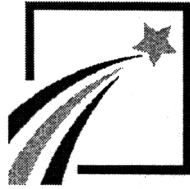
**TOP FLITE**

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*Ben Hogan*

A01-0025



*National  
Environmental  
Achievement Track*

*Application Form*

SPALDING SPORTS WORLDWIDE

Name of facility

Name of parent company (if any)

425 Meadow Street

Street address (continued)

Chicopee, MA 01013

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

William Sweetman

Manager Safety & Environmental Engineering

Phone 413-322-2637

Fax 413-322-2043

E-mail bsweetman@spalding.com

*Why do we need this information?*

EPA needs background information on your facility to evaluate your application.

*What do you need to do?*

- Provide background information on your facility.
- Identify your environmental requirements.

# Section A

*Tell us about your facility.*

1 What do you do or make at your facility?

- Corporate Headquarters
- Manufacturing & distribution of sporting goods, including golfballs, golf clubs, and golf shoes

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC  
3949

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes

☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000

## Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

MAD 00 1113331

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

See Completed Checklist

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Spalding has been recognized through the EPA's Environmental Leadership Program and has been an active participant in its Startrack Program, including annual compliance and EMS audits, coupled with Environmental Performance Reporting.

Spalding has conducted Earth Day recognition activities for employees, their families, and the community for the past ten years.

*Why do we need this information?*

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

*What do you need to do?*

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

# Section B

*Tell us about your EMS.*

- 1 Check *yes* if your EMS meets the requirements for each element below as defined in the instructions.

*a.* Environmental policy ☒ Yes

*b.* Planning ☒ Yes

*c.* Implementation and operation ☒ Yes

*d.* Checking and corrective action ☒ Yes

*e.* Management review ☒ Yes

- 2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

- 3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

- 4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

(Spalding Audit Protocol)

☒ Third-party assessment

☐ ISO 14001 Certification

☒ Other Third-party compliance and EMS Assessments were conducted in 1998 as part of Starrack participation.

### *Why do we need this information?*

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

### *What do you need to do?*

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

# Section C

*Tell us about your past achievements and future commitments.*

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

### *First aspect you've selected*

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Air Emissions - VOC	Year 1997: 57	Tons	Year 1999: 33	Tons
<p>i. How is the current level an improvement over the previous level?</p> <ul style="list-style-type: none"><li>- Net reduction of 24 tons/year, which included equipment and procedural efficiencies in the amount of paint used to generate a reduction of 0.108 lbs. VOC/100 dozen golfballs (DZ GB).</li></ul>				
<p>ii. How did you achieve this improvement?</p> <ul style="list-style-type: none"><li>- Formulation enhancements (higher solids' reduced VOC)</li><li>- Process modifications (altered spray gun set-ups, paint application)</li><li>- Improved operations/maintenance</li><li>- Increased employee training</li></ul>				

## Section C, continued

### Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Solid waste (non-hazardous)	Year 1997: 1238	tons	Year 1999: 1066	tons
<p>i. How is the current level an improvement over the previous level?</p> <ul style="list-style-type: none"> <li>- Net decrease of 172 tons/year (14%) of spent materials landfilled, with a complimentary increase in the volume recycled.</li> </ul>				
<p>ii. How did you achieve this improvement?</p> <ul style="list-style-type: none"> <li>- Better/improved segregation and collection systems</li> <li>- Increased training</li> <li>- Added reuse and recycling of spent materials</li> <li>- Source reduction</li> </ul>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

### First aspect you've selected

- a. What is the aspect? Solid Waste: Zinc compounds generated as byproduct and disposed of as waste
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 181,650 lbs. of zinc compounds (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:  
Absolute value 100,000 lbs.  
(Quantity/Units)
- ☐ Option B:  
In terms of  
units of production (Quantity/Units)  
or output

e. How will you achieve this improvement?

- Modify current hopper design and powder feed systems
- Additional training
- Improve collection system

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### *Second aspect you've selected*

a. What is the aspect?

Total Energy Use

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:  
Absolute value (Quantity/Units)
- ☒ Option B:  
In terms of  
units of production 34,115 BTUs/DZ GB  
or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:  
Absolute value (Quantity/Units)
- ☒ Option B:  
In terms of  
units of production 1706 BTUs/DZ GB (5%  
or output reduction)  
(Quantity/Units)

e. How will you achieve this improvement?

- Equipment modifications
- Increased training
- Facility enhancements



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### *Third aspect you've selected*

- a. What is the aspect? **Materials Use: Increase on-site recycling/reuse of spent solvents**
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output **44% of solvents recycled/ solvents used** (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value (Quantity/Units)
- ☒ Option B: In terms of units of production or output **60% of solvents recycled/ solvents used** (Quantity/Units)
- e. How will you achieve this improvement?
- Improved collection systems
  - Increased training
  - Added equipment controls

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### *Fourth aspect you've selected*

- a. What is the aspect? **Solid Waste (Non-hazardous)**
- b. Is this aspect identified as significant in your EMS? ☐ Yes ☒ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value **1066 tons landfilled** (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value **100 tons reduction so that <996 tons landfilled** (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- Increase in material recycling
  - Improved process efficiencies
  - Contractor management improvements
  - Enhanced training

### *Why do we need this information?*

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

### *What do you need to do?*

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

# Section D

*Tell us about your public outreach and reporting.*

1 How do you identify and respond to community concerns?

- Active member of Chicopee's Local Emergency Planning Commission
- Active member of Chicopee Chamber of Commerce
- External communication and reporting procedure (see attached)

2 How do you inform community members of important matters that affect them?

- Notify public officials
- Post public notice information, as required, in local newspaper
- Participation on local committees - city environmental initiatives

3 How will you make the Achievement Track Annual Performance Report available to the public?

- ☒ Website [www.epa.gov](http://www.epa.gov)
- ☒ Newspaper
- ☐ Open Houses
- ☒ Other
  - Notice to public officials

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/ Citizen Group</i>	Mayor - City of Chicopee	Mayor Richard Kos	413-594-1500
<i>State/Local Regulator</i>	MA DEP - Worcester	Robert Bois	508-792-7650
<i>Other community/local reference</i>	Chicopee Fire Dept.	Robert Nunes, Fire Chief	413-594-1630

# Section E

## Application and Participation Statement

On behalf of Spalding Sports Worldwide  
[my facility],

I certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Michael Esch

/9-27-00

Printed Name/Title

Michael Esch

/EVP of operations

Facility Name

Spalding Sports Worldwide

Facility Street Address

425 Meadow St., Chicopee, MA 01013

Facility ID Numbers

EPA I.D.#: MA700111331

State I.D.#: 130559

Employer I.D.#: 592439116

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail [ptrack@indecon.com](mailto:ptrack@indecon.com). Mail completed applications to:

The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

## National Environmental Achievement Track

### *Environmental Requirements Checklist*

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

**Facility Name** Spalding Sports Worldwide  
**Facility Location:** 425 Meadow St., Chicopee, MA 01013  
**Facility ID Number(s):** EPA I.D. #: MAD00111331  
*(attach additional sheets if necessary)* State I.D. #: 130559  
Employer I.D. #: 592439116

#### Air Pollution Regulations

Check All  
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) ☒
2. Permits and Registration of Air Pollution Sources ☒
3. General Emission Standards, Prohibitions and Restrictions ☒
4. Control of Incinerators ☐
5. Process Industry Emission Standards ☐
6. Control of Fuel Burning Equipment ☒
7. Control of VOCs ☒
8. Sampling, Testing and Reporting ☒
9. Visible Emissions Standards ☒
10. Control of Fugitive Dust ☐
11. Toxic Air Pollutants Control ☒
12. Vehicle Emissions Inspections and Testing ☐

**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)**

13. MA DEP Rideshare Program - 310 CMR 7.16 ☒
14. MA DEP Air Regulations - 310 CMR 7.0 ☒

#### Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
  - Characteristic Waste ☒
  - Listed Waste ☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - Manifesting ☒

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
  - Transfer facility requirements ☐
  - Manifest system and record-keeping ☐
  - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
  - General facility standards ☐
  - Preparedness and prevention ☐
  - Contingency plan and emergency procedures ☐
  - Manifest system, Record keeping and reporting ☐
  - Groundwater protection ☐
  - Financial requirements ☐
  - Use and management of containers ☐
  - Tanks ☐
  - Waste piles ☐
  - Land treatment ☐
  - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

**Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)**

- 8. MA DEP 310 CMR 30.00 ☒
- 9. ☐

**Hazardous Materials Management**

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

**Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)**

- 6. Flammable Liquid Storage Permit per Chapter 14B, Section 13, Chicopee General Laws ☒
- 7. ☐

**Solid Waste Management**

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐

- |   |                          |
|---|--------------------------|
| 3. Installation of Systems of Refuse Disposal   | <input type="checkbox"/> |
| 4. Solid Waste Storage and Removal Requirements | <input type="checkbox"/> |
| 5. Disposal Requirements for Special Wastes     | <input type="checkbox"/> |

**Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)**

- |    |                          |
|----|--------------------------|
| 6. | <input type="checkbox"/> |
| 7. | <input type="checkbox"/> |

**Water Pollution Control Requirements**

- |   |                                     |
|---|-------------------------------------|
| 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)                                 | <input checked="" type="checkbox"/> |
| 2. Designation of Hazardous Substances (40 CFR 116)   | <input checked="" type="checkbox"/> |
| 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)                         | <input checked="" type="checkbox"/> |
| 4. NPDES Permit Requirements (40 CFR 122)   | <input type="checkbox"/>            |
| 5. Toxic Pollutant Effluent Standards (40 CFR 129)  | <input type="checkbox"/>            |
| 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)                           | <input checked="" type="checkbox"/> |
| 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)          | <input type="checkbox"/>            |
| 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)        |                                     |
| 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)                  |                                     |
| 10. Water Quality Standards   | <input type="checkbox"/>            |
| 11. Effluent Limitations for Direct Dischargers   | <input type="checkbox"/>            |
| 12. Permit Monitoring/Reporting Requirements  | <input checked="" type="checkbox"/> |
| 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants | <input type="checkbox"/>            |
| 14. Collection, Handling, Processing of Sewage Sludge   | <input type="checkbox"/>            |
| 15. Oil Discharge Containment, Control and Cleanup  | <input type="checkbox"/>            |
| 16. Standards Applicable to Indirect Discharges (Pretreatment)  | <input checked="" type="checkbox"/> |

**Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)**

- |                                  |                                     |
|----------------------------------|-------------------------------------|
| 17. Chicopee Sewer Use Ordinance | <input checked="" type="checkbox"/> |
| 18.                              | <input type="checkbox"/>            |

**Drinking Water Regulations**

- |  |                          |
|--|--------------------------|
| 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) | <input type="checkbox"/> |
| 2. National Primary Drinking Water Standards (40 CFR 141)                                  | <input type="checkbox"/> |
| 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)             | <input type="checkbox"/> |
| 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources   | <input type="checkbox"/> |



5. Underground Injection Control Requirements ☐
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

**Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)**

7. ☐
8. ☐

**Toxic Substances**

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☒
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

**Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)**

10. ☐
11. ☐

**Pesticide Regulations**

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

**Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)**

9. ☐
10. ☐

**Environmental Clean-Up, Restoration, Corrective Action**

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

☐

2. RCRA Corrective Action (identify)

☐☐☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,  
Corrective Action Regulations Not Listed Above (identify)**

3. MA DEP M.C.P. Corrective Action - 310 CMR 40.00

☒

4.

☐